

1 RENE L. VALLADARES
Federal Public Defender
2 Nevada State Bar No. 11479
CHRISTOPHER P. FREY
3 Assistant Federal Public Defender
Nevada State Bar No. 10589
4 201 W. Liberty Street, Suite 102
Reno, Nevada 89501
5 (775) 321-8451/Tel.
(775) 784-5369/Fax
6 chris_frey@fd.org

7 Attorney for STEVEN BRYAN

8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 STEVEN BRYAN

15 Defendant.

Case No. 3:19-cr-00060-MMD-WGC

**STIPULATION TO CONTINUE
MOTION DEADLINES**
(Fourth Request)

16
17 IT IS HEREBY STIPULATED AND AGREED, by and between Rene L. Valladares,
18 Federal Public Defender, and CHRISTOPHER P. FREY, Assistant Federal Public Defender,
19 counsel for STEVEN BRYAN, Christopher Chiou, Acting United States Attorney, and
20 PENELOPE J. BRADY, Assistant United States Attorney, counsel for the United States of
21 America, that the motion deadlines be extended two weeks. Parties herein shall have to and
22 including April 6, 2021, to file any and all pretrial motions and notices of defense. Parties shall
23 have to and including April 20, 2021, to file any and all responsive pleadings. Parties shall have
24 to and including April 27, 2021, to file any and all replies to dispositive motions.

25 The Stipulation to continue is entered into for the following reasons:

- 26 1. The client is currently detained and does not oppose the continuance.

2. Counsel for the defendant will need additional time to conduct investigation in this case in order to determine whether there are any pretrial issues that must be litigated and whether the case will ultimately go to trial or resolved through negotiations.

3. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for the defendant sufficient time to complete necessary research, prepare and submit appropriate pretrial motions.

4. The proposed date would allow counsel to represent other clients zealously and still allow for meaningful investigation and litigation of this case, including the filing of pretrial and trial motions.

This is the fourth stipulation to continue filed herein.

DATED this 16th day of March, 2021.

RENE L. VALLADARES
Federal Public Defender

CHRISTOPHER CHIOU
Acting United States Attorney

By: /s/ Christopher P. Frey
CHRISTOPHER P. FREY
Assistant Federal Public Defender
Counsel for Steven Bryan

By: /s/ Penelope J. Brady
PENELOPE J. BRADY
Assistant United States Attorney
Counsel for United States

IT IS SO ORDERED:

DATED this 17th of March, 2021.


MIRANDA M. DU
CHIEF UNITED STATES DISTRICT JUDGE